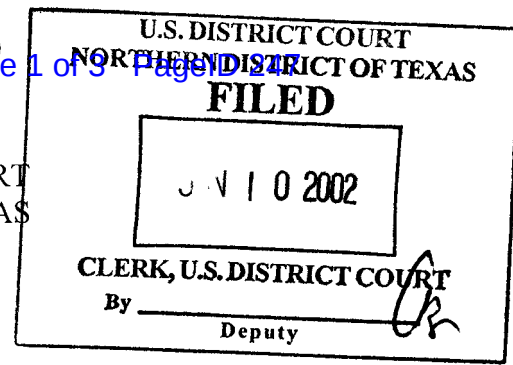


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



JAMAL ELHAJ-CHEHADE,
Plaintiff,

v.

EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES,
Defendant.

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CIVIL ACTION NO.

3:01-CV-01301-L

**EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL GRADUATES MOTION
FOR MORE DEFINITIVE STATEMENT OR, IN THE ALTERNATIVE, RESPONSE TO
CHEHADE'S MOTION FOR SUMMARY JUDGMENT**

Educational Commission For Foreign Medical Graduates ("ECFMG"), Defendant in the above-entitled and numbered cause, files this Motion for More Definitive Statement or, in the Alternative, Response to Chehade's Motion For Summary Judgment. In support thereof, ECFMG would respectfully show this Court as follows:

1. Pursuant to Federal Rule of Civil Procedure 12(e), ECFMG contends that Chehade's Motion for Summary Judgment is so vague and ambiguous that it cannot reasonably frame a responsive pleading thereto. Therefore, ECFMG requests that this Court order Chehade to replead his Motion for Summary Judgment in greater conformity with the Rules of Civil Procedure so that ECFMG may more adequately form a responsive pleading.

2. In the alternative, and in an abundance of caution, ECFMG will attempt to respond to Chehade's Motion for Summary Judgment to the extent that ECFMG is able to make sense of such Motion.

3. Pursuant to Local Civil Rule 56.3 and 56.4, ECFMG will rely on the separately filed Brief In Support of Motion for More Definitive Statement or, in the Alternative, Response to Chehade's Motion For Summary Judgment as well as its separately filed Appendix in Support

Motion for More Definitive Statement or, in the Alternative, Response to Chehade's Motion For Summary Judgment, all of which are incorporated by reference into this Motion and Response.

PRAYER

ECFMG prays that the Court grant order Chehade to replead his Motion For Summary Judgment or, in the alternative, deny his Motion for Summary Judgment in its entirety. ECFMG also prays that the Court order any and all other relief to which it may show itself justly entitled.

Respectfully submitted,

By: 

Susan Abbott Schwartz
State Bar No. 00797900
Barry A. Moscowitz
State Bar No. 24007493
Mark C. Roberts II
State Bar No. 00788293

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**ATTORNEYS FOR DEFENDANT
EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES**

CERTIFICATE OF SERVICE

The undersigned certifies that on this 7th day of June, 2002, a true and correct copy of the above and foregoing document was served upon the following party appearing *pro se* of record via certified mail, return receipt requested:

Jamal Elhaj-Chehade
5414 Cedar Springs, #806
Dallas, Texas 75235
(214) 521-7541

Certified Mail, Return Receipt: 7002 0510 0004 4353 3706



Mark C. Roberts II

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